

G O D D A R D L A W P L L C

39 Broadway, Suite 1540 | New York, NY 10006

Office . 646.504.8363

Fax. 212.473.8705

Megan@goddardlawnyc.com

WWW.GODDARDLAWNYC.COM

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 08/25/2023

August 25, 2023

VIA ECF

The Honorable Judge Valerie Caproni
United States District Court Judge
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: Shanell Martinez v. 189 Chrystie Street Partners, LP d/b/a The Box, et al.
Civ No.: 1:22-cv-03111-VEC

Dear Judge Caproni:

The undersigned represents Plaintiff Shanell Martinez ("Plaintiff"), in the above-referenced matter. Plaintiff writes, with Defendants' consent, to respectfully request a 30-day extension of her August 31, 2023, deadline to show cause why her Eleventh and Twelfth causes of action should not be dismissed for lack of standing or file a motion for leave to file a second amended complaint to and including October 2, 2023.

This extension is needed because Ms. Goddard is currently traveling and will be away until September 11, 2023.

This is Plaintiff's first request for extension of her August 31, 2023, deadline.

We thank the Court for its time and attention to this matter and its consideration of this request.

Respectfully submitted,

GODDARD LAW PLLC
Attorneys for Plaintiff

By: Megan S. Goddard
Megan S. Goddard, Esq.

cc: All Counsel of Record [Via ECF]

Application GRANTED. In light of the lengthy extension, no further extensions will be granted absent good cause.
SO ORDERED.



08/25/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE